Comments to NPRM 03-137
3rd May 2004

Launchpad Applications
BREWapi
BREW Distribution System
gpsOne
CDMA Chipsets
Homeland Security Initiatives
Fleet Management Solutions
CDMA2000 1X
CDMA2000 1xEV-DO
CDMA2000 1xEV-DV
WCDMA/UMTS
Application Solutions
Mobile Processors
Base Station Processors
Radio Processors
CDMA University
Network Optimization
Software Tools
Development Tools
QCTest Tools
Client Software
Digital Cinema
Advanced Security Solutions

Australia • Austria • Belarus • Brazil • Canada • Chile • China • Colombia • Denmark • Dominican Republic • Ecuador • Guatemala • India • Indonesia • Israel • Italy • Japan • Mexico • Moldova • New Zealand • Nicaragua • Panama • Romania • Russia • South Korea • Sweden • Taiwan • Thailand • United Kingdom • United States • Venezuela • Vietnam

QUALCOMM CDMA Technologies
QUALCOMM Technology Licensing
QUALCOMM Wireless and Internet Group
QUALCOMM Strategic Initiatives

Verizon Wireless Going Nationwide With Flat-Rate EV-DO

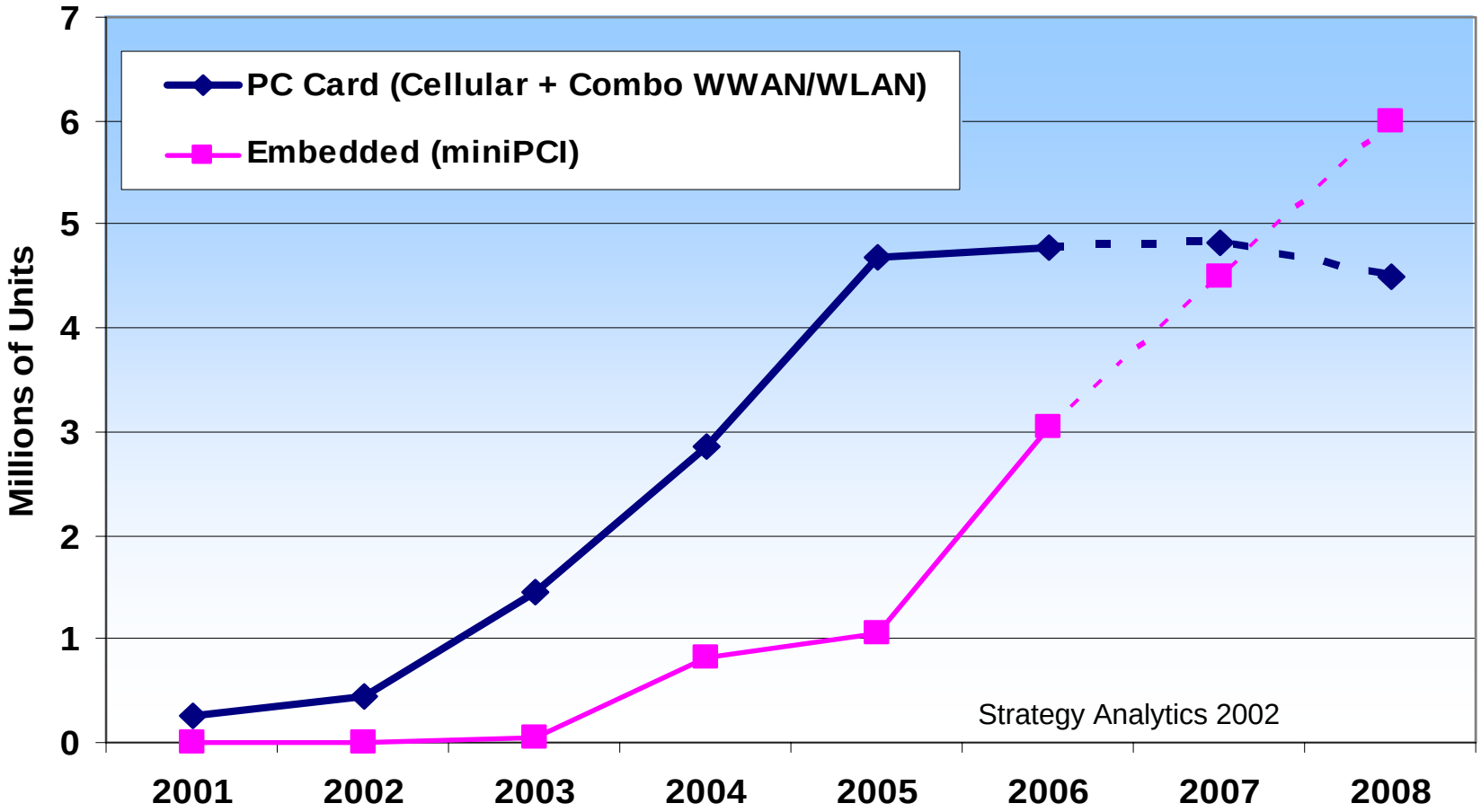
- **CDMA2000 1XEV-DO deployment to go beyond the current two markets -- San Diego and Washington, D.C.**

- **Offered at $79.99 flat rate, all-u-can eat pricing, 1xEV-DO offers speeds of 300 to 500 kilobits per second, or about 10 times the average dial-up connection speed...**

- **Verizon says it will spend $1 billion over the next two years to launch the EV-DO network... the company's nationwide deployment will be marketed to both consumers and enterprises...**

Source: Verizon Wireless, January 2004

Cellular Connectivity in Notebooks



- **PC card growth will peak in 2006 as embedded solutions overcome technical barriers, and as multi-mode solutions become viable**
- **PC cards will continue to offer legacy support for installed notebook base**

QC NPRM 03-137 Comments

- **The NPRM proposed changes apply only to Part 15 modular devices. QUALCOMM urges the FCC to adopt similar rules for Part 22 and Part 24 modular devices.**

- **Given the rapid proliferation of 3G technologies the laptop and PDA manufacturers wish to offer an integrated solution using modules based on technologies such as 1xRTT and/or 1xEV-DO**

- **By adopting rules to streamline the authorization process for Part 22 and Part 24 modular devices the FCC will enable the computing industry to bring WWAN products to market in a timely and cost effective manner**

- **The FCC should enact clear requirements for SAR testing of products with embedded authorized modules and antenna subsystems**

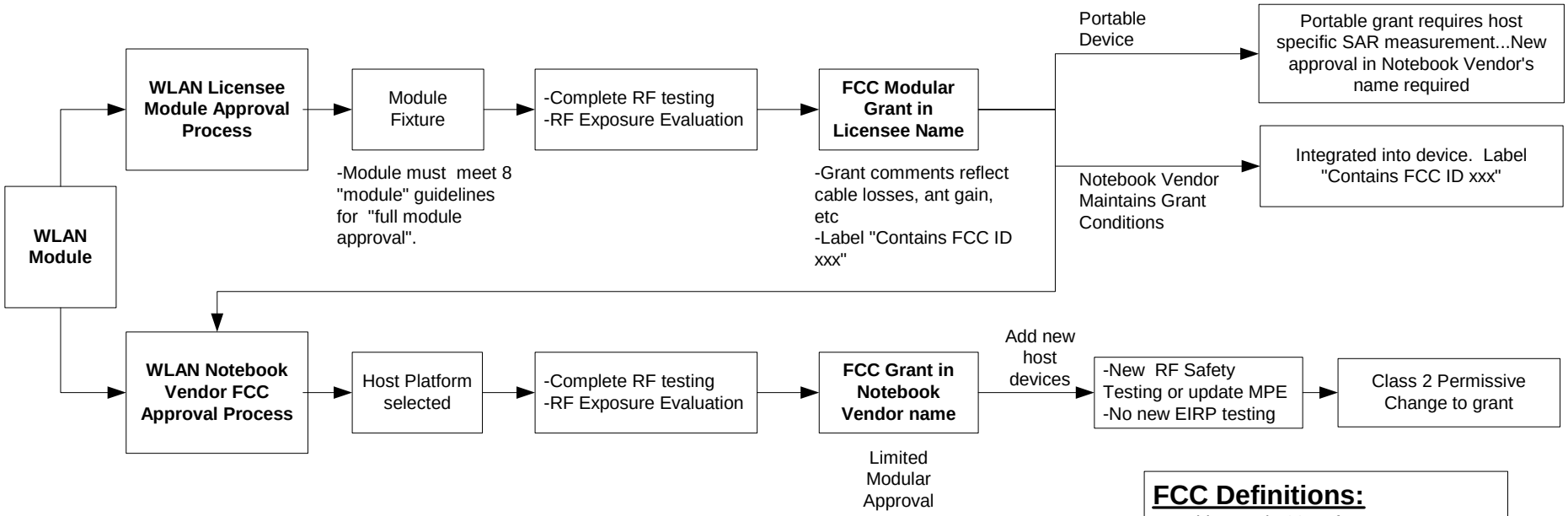
- **The FCC should exempt devices from SAR evaluations when the antennas are located in the laptop display a distance of 20 cm or greater from the users body**

Formalize SAR Measurement Procedure for Laptops

- **The OET Mobile and Portable RFx Procedure (March 18, 2004) released to TCBs and Interpretations database item 20040323-001**
  - **Defines measurement positions for laptops**
  - **Defines measurement requirements for laptops with antenna's located in the display portion of laptop where 20cm separation distance can be maintained, i.e. no SAR if 20cm separation distance maintained**
  - **Defines 3 host method for PC cards i.e. PCMCIA or PCIe**
- **Document is in-line with Qualcomm recommendations**
- **Part 2 Rules should reflect the requirements detailed in this document**

FCC Approval Process For WLAN

Part 15 Product Approval Process



FCC Definitions:

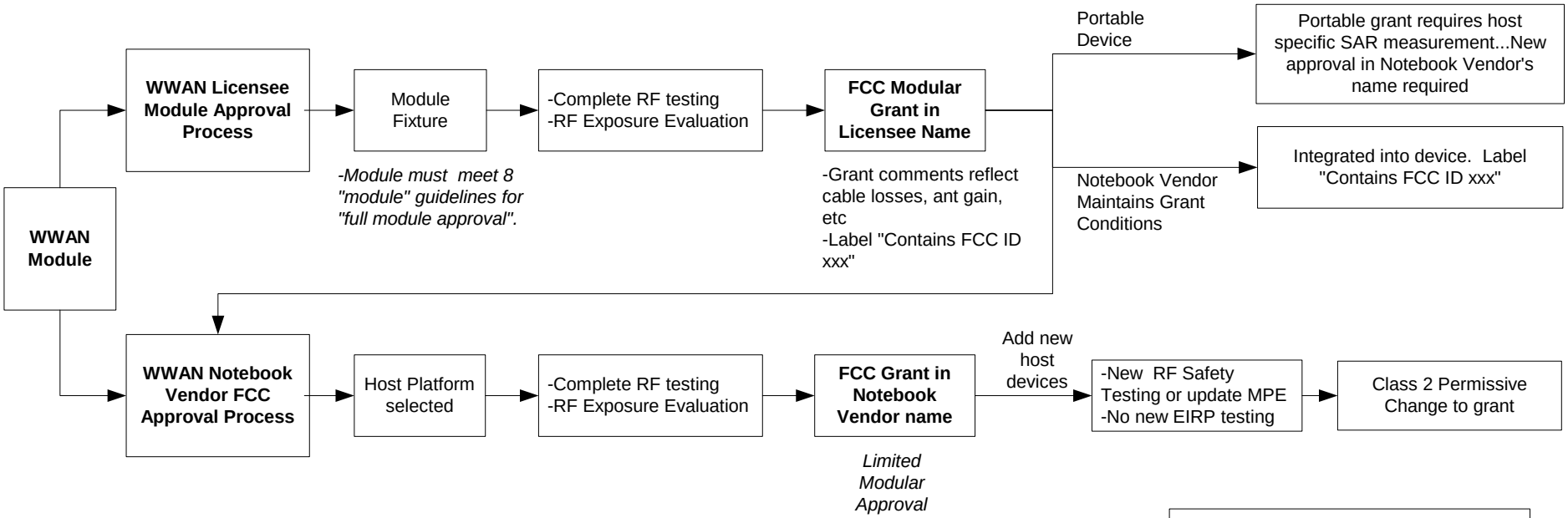
Portable: used <20cm from user
Mobile: used >20cm from user

Class 1 permissive change=No notification to FCC

Class 2 permissive change=Data submitted to FCC

FCC Approval Process For WWAN

FCC Part 22 and Part 24 Devices



Note: Modular and Limited Modular Approval process is not yet formalized within the FCC. See NPRM Docket 03-137

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